

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: TOMMIE GRAHAM & : Chapter 13  
HATTIE GRAHAM :  
: CHAPTER 13 TRUSTEE'S MOTION FOR :  
DISMISSAL :  
Respondents : No. 18-16594-MDC

**ORDER**

AND NOW, this day of , 2019, upon consideration of the Motion of William Miller, Esquire, Chapter 13 Standing Trustee's for Dismissal, all response thereto, and evidence in support and opposition to the Motion,

ORDERED that said Motion be, and hereby is DENIED.

BY THE COURT:

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Judge Magdeline D. Coleman  
United States Bankruptcy Judge

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**DEBTORS' ANSWER TO MOTION FOR DISMISSAL**

Debtors TOMMIE GRAHAM & HATTIE GRAHAM, by their attorney, Daniel Muklewicz, answers the Motion for Dismissal, stating as follows:

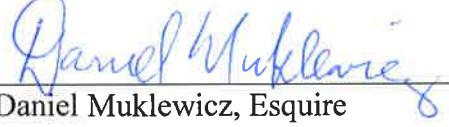
1. Debtors are current on their Chapter 13 Plan payments and have paid \$5,250.00 into their plan, as of April 17, 2019. The creditors will receive will receive payment upon confirmation of the bankruptcy plan.

WHEREFORE, Debtor respectfully requests that this Court enter an Order denying the Motion for Dismissal.

**Respectfully submitted,**

**AVALLONE LAW ASSOCIATES**

4/23/2019  
DATE

  
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Daniel Muklewicz, Esquire  
Attorney for Debtor  
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Philadelphia, PA 19107-5318  
(215) 735-5525  
Attorney ID No. 320322  
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**CERTIFICATION OF SERVICE  
DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM STAY**

I, Daniel Muklewick, Attorney for Debtor, hereby certify that on the date indicated below, I served by first class mail or electronic means a copy of the accompanying Answer to the Motion for Dismissal filed by the chapter 13 standing trustee, William C. Miller, Esquire upon the following:

William C. Miller, Esquire  
P.O. Box 1229  
Philadelphia, PA 19105

4/23/2019  
DATE

AVALLONE LAW ASSOCIATES

  
Daniel Muklewick, Esquire  
Attorney for Debtor  
215 S. Broad Street, Fifth Floor  
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Attorney ID No. 320322  
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